

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVID T. COOPER

:NO: 08-346

vs.

:

OFFICER RAYMOND J. HAVRILAK  
CORPORAL GRIMM AND OFFICER  
HATFIELD

:

:

**ANSWER OF DEFENDANTS, GRIMM, HAVRILAK AND HATFIELD TO THE  
AFFIRMATIVE DEFENSES /CROSS CLAIM OF DEFENDANT REGINALD A.  
ROBERTS**

Defendants, Grimm, Havrilak and Hatfield by through their counsel Paola Tripodi Kaczynski, Esquire file their Answer to the Affirmative Defenses/Cross Claim of Defendant, Reginald A. Roberts and aver as follows:

**ANSWER TO DEFENDANT'S THIRD AFFIRMATIVE DEFENSE/CROSS  
CLAIM**

Denied. The allegations contained in this paragraph are conclusions of law to which no response is required. They are therefore denied. To the extent that these allegations are not deemed conclusions of law, it is denied that Answering Defendants are solely liable to the Plaintiff and/or liable to Defendant Roberts.

**ANSWER TO DEFENDANT'S FOURTH AFFIRMATIVE DEFENSE/CROSS  
CLAIM**

Denied. The allegations contained in this paragraph are conclusions of law to which no response is required. They are therefore denied. To the extent that these allegations are not deemed conclusions of law, it is denied that Answering Defendants are solely liable to the Plaintiff and/or liable to Defendant Roberts.

**ANSWER TO DEFENDANT'S FIFTH AFFIRMATIVE DEFENSE/CROSS  
CLAIM**

Denied. The allegations contained in this paragraph are conclusions of law to which no response is required. They are therefore denied. To the extent that these allegations are not deemed conclusions of law, it is denied that Answering Defendants are solely liable to the Plaintiff and/or liable to Defendant Roberts.

WILLIAM J. FERREN & ASSOCIATES

BY: /s/ Paola Tripodi Kaczynski, Esquire  
Paola Tripodi Kaczynski, Esquire  
Attorney for Defendants, Havrilak,  
Grimm and Hatfield  
ID#: 59602  
1500 Market Street- Suite 2920  
Philadelphia, PA 19102  
267-675-3009

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVID T. COOPER

:NO: 08-346

vs.

:

OFFICER RAYMOND J. HAVRILAK  
CORPORAL GRIMM AND OFFICER  
HATFIELD

:

:

**CERTIFICATE OF SERVICE**

I, Paola Tripodi Kaczynski, Esquire do hereby certify that the within Answer of Defendants, Havrilak, Grimm and Hatfield to Co-Defendant, Roberts' Affirmative Defenses/Cross Claim was electronically filed with the Court and copies were sent to all plaintiff (who is *pro se*) and all counsel via e-mail and/or United States mail on October 15, 2009

BY: WILLIAM J. FERREN & ASSOCIATES  
/s/ Paola Tripodi Kaczynski, Esquire  
Paola Tripodi Kaczynski, Esquire  
Attorney for Defendants, Havrilak,  
Grimm and Hatfield  
ID#: 59602  
1500 Market Street- Suite 2920  
Philadelphia, PA 19102  
267-675-3009